

Hon. Benjamin H. Settle

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

ALISHAN AHMED,

Plaintiff,

v.

HYUNDAI CAPITAL AMERICA, INC.,
dba HYUNDAI MOTOR FINANCE, dba
KIA MOTOR FINANCE, a California
Corporation,

Defendant.

Case No. 3:25-cv-05134-BHS

**DEFENDANT'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO
RESPOND TO COMPLAINT
(FIRST EXTENSION)**

**NOTE ON MOTION CALENDAR:
FEBRUARY 21, 2025**

LCR 7(j) CERTIFICATION

In compliance with Local Civil Rule 7(j), counsel for Defendant Hyundai Capital America, Inc. conferred with counsel for Plaintiff regarding this motion. Plaintiff does not oppose this motion.

MOTION

Pursuant to Fed. R. Civ. P. 6(b), Defendant moves the Court for an order extending the deadline to file an answer or other responsive pleading to March 7, 2025.

This matter was removed to this Court on February 19, 2025, making an answer or other responsive pleading due February 26, 2026 under Fed. R. Civ. P. 81(c)(2)(C). Counsel for Defendant seeks an extension of time due to ongoing discussions among counsel regarding the

DEFENDANT'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE ANSWER
TO COMPLAINT (FIRST EXTENSION):
CASE NO. 3:25-cv-05134-BHS

HOLLAND & KNIGHT LLP
601 SW Second Avenue, Suite 1800
Portland, OR 97204
Telephone: 503.243.2300

1 potential for arbitration of the claims asserted in this matter. Further, the additional time will
2 assist Defendant in gathering information to prepare any response that may be necessary.

3 This is the first request for an extension of time filed in this matter. This motion is not
4 filed for the purpose of delay, and no party will be prejudiced by the granting of this motion. By
5 filing this motion, Defendant does not waive and expressly reserves all defenses and objections it
6 may have in this action, including but not limited to the defenses made available by Fed. R. Civ.
7 P. 12 and the defense that Plaintiff's claims are subject to binding arbitration.

8
9 Dated this 21st day of February, 2025

10 HOLLAND & KNIGHT LLP

11 By: s/Garrett S. Garfield

12 Garrett S. Garfield, WSBA No. 48375

13 E-mail: garrett.garfield@hklaw.com

14 601 SW Second Avenue, Suite 1800

15 Portland, OR 97204

16 Telephone: 503.243.2300

17 *Attorneys for Hyundai Capital America, Inc., dba*
18 *Hyundai Motor Finance, dba Kia Motor Finance*

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO COMPLAINT (FIRST EXTENSION) to be served on the following person[s]:

SaraEllen Hutchison,
LAW OFFICE OF
SARAELLEN HUTCHISON, PLLC
1102 A ST
STE 300 PMB 66
Tacoma, WA 98402
Telephone: 206-529-5195
Facsimile: (253) 302-8486
E-mail: saraellen@saraellenhutchison.com

Attorneys for Plaintiff

by causing the document to be delivered by the following indicated method or methods:

☒ by CM/ECF electronically mailed notice from the Court on the date set forth below.

DATED February 21, 2025.

s/Garrett S. Garfield

Hon. Benjamin H. Settle

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

ALISHAN AHMED,
Plaintiff,

v.

HYUNDAI CAPITAL AMERICA, INC.,
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Defendant.

Case No. 3:25-cv-05134-BHS

**ORDER GRANTING DEFENDANT'S
UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND
TO COMPLAINT
(FIRST EXTENSION):**

Defendant Hyundai Capital America, Inc., dba Hyundai Motor Finance, dba Kia Motor Finance, ("Defendant"), has filed an Unopposed Motion for Extension of Time to answer, move, or otherwise respond to Plaintiffs' Complaint.

Upon consideration of this Motion, for good cause shown and by agreement of the parties, it is hereby,

ORDERED that Defendant's Unopposed Motion for Extension of Time is **GRANTED**.

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ORDER GRANTING DEFENDANT'S UNOPPOSED
MOTION FOR EXTENSION OF TIME TO FILE
ANSWER TO COMPLAINT (FIRST EXTENSION):
CASE NO. 3:25-cv-05134-BHS

1 It is FURTHER ORDERED that Defendant shall answer, move, or otherwise respond to
2 Plaintiff's Complaint by March 7, 2025.

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4 Dated this 24th day of February, 2025



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6
7
8 Benjamin H. Settle
9 United States District Court Judge

10
11 Submitted By: s/Garrett S. Garfield

12 Garrett S. Garfield, WSBA No. 48375
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14 601 SW Second Avenue, Suite 1800
15 Portland, OR 97204
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17 *Attorneys for Hyundai Capital America, Inc.,*
18 *dba Hyundai Motor Finance, dba Kia Motor*
19 *Finance*

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing [PROPOSED] ORDER GRANTING DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO COMPLAINT (FIRST EXTENSION):to be served on the following person[s]:

SaraEllen Hutchison,
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Attorneys for Plaintiff

by causing the document to be delivered by the following indicated method or methods:

☒ by CM/ECF electronically mailed notice from the Court on the date set forth below.

DATED February 21, 2025.

s/Garrett S. Garfield